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9 ADVENT PRODUCT DEVELOPMENT, INC.,
10 DENICE THURLOW, AND
11 ALPHONSO EILAND

12 UNITED STATES DISTRICT COURT
13 FOR THE SOUTHERN DISTRICT OF CALIFORNIA

14
15 MATTHEW WATERS, individually and on
16 behalf of other members of the general public
similarly situated,

17 Plaintiff,

18 v.

19 ADVENT PRODUCT DEVELOPMENT,
20 INC., a South Carolina Corporation, DENICE
21 THURLOW, ALPHONSO EILAND, and
DOES 1 through 50, inclusive,

22 Defendants.

CASE NO.: 07-cv-2089 (BTM)(LSP)

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**SUPPLEMENTAL DECLARATION OF
CARRIE A. LONGSTAFF, ESQ.**

23
24 1. I, Carrie A. Longstaff, am an attorney with the law firm of Gibbons P.C. and
25 am admitted *pro hac vice* to practice before this Court in the above captioned action. I
26 hereby make this Declaration in support of defendants' (collectively, "Advent") motion to
27 dismiss.

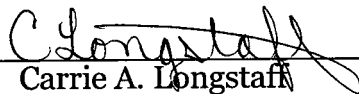
28 2. Our firm, together with the law firm of Blanchard Krasner & French

1 represent Advent in the above captioned action.

2 3. Currently pending before the Court is Advent's motion to dismiss, grounded
3 in part on an earlier filed, substantially related action pending between the parties in
4 South Carolina and a forum selection clause in the parties' underlying agreement that
5 requires that all disputes be adjudicated in South Carolina courts. Advent's motion was
6 filed on November 7, 2007. (Mot. Dismiss, Docket Entry 4 (Nov. 7, 2007)).
7

8 4. The purpose of this declaration is to update the Court on the status of the
9 South Carolina action. Discovery in the South Carolina action is underway. Specifically,
10 written discovery requests have been served and plaintiff Mathew Waters' deposition is
11 currently scheduled.
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13 I declare under penalty of perjury that the foregoing information is true and
14 correct to the best of my knowledge.
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17 BY: 
Carrie A. Longstaff

18 Dated: February 22, 2008
19 Newark, New Jersey
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